UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JAMES JOSEPH JULUKE, JR., an individual, Plaintiff, v. EAST LA HOME IMPROVEMENT LLC, a Delaware Limited Liability Company, Defendant.	Case No.: 3:16-cv-02521-D

James Joseph Juluke, Jr., hereby declares as follows:

1. I am the Plaintiff in this action. I have retained counsel, Ku & Mussman, P.A., to represent me in the prosecution of this matter.

2. In 1994, I suffered an injury to my spinal cord resulting in trauma to my T-10 vertebrae. As a result, I am a paraplegic and use a wheelchair for mobility.

3. Prior to bringing this action, I visited and shopped at the shopping center, generally located at 9203 Skillman St, Dallas, TX 75243 ("Defendant's Property") owned by Defendant in August 2016.

4. During my visits to the Property, I encountered numerous barriers to access which required me to use extra caution maneuvering throughout the plaza and required that I avoid certain dangerous elements of the Property.

5. More specifically, the following:

a. The disabled use parking space near City Nails has improper placement of a ramp in its access aisle; and

b. The disabled use parking spaces near Smiley Dental lack proper signage and access aisles;

c. The curb ramps at the Wash & Dry improperly lacks handrails and edge protection; and

d. The disabled use parking space near Villa Clothing store has improper placement of a ramp in its access aisle.

6. I intend to return to the Defendant's Property as both a patron of the stores located at the Property and to determine whether the barriers to access have been remedied.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the injunctive relief claimed is justly due to Plaintiff, that no part thereof has been performed, and that the relief sought in this action is necessary to bring the Defendant's Property into full compliance with the Americans with Disabilities Act.

Dated: December 5, 2016

FURTHER AFFIANT SAYETH NAUGHT.

[Continued on Following Page]

State of Texas

County of Dallas

James Joseph Juhnke, Jr.

Sworn to me before this 30th

day of November, 2016.

Tyra B Morgan

Notary Public

TYRA BROOKS MORGAN
Notary Public, State of Texas
My Commission Expires
September 04, 2018

Personally Known ________ OR Produced Identification ________

Type of Identification Produced
STATE Identification